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December 27, 2021

John L. Sinatra, Jr.
United States District Judge
Robert H. Jackson United States Courthouse
2 Niagara Square
Buffalo, New York 14202

Re: United States of America v. Joseph Bongiovanni, et al.
Case No.: 19-CR-227
Motion for Reconsideration

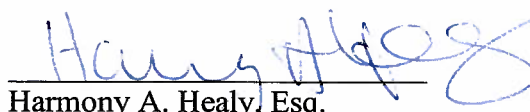
Dear Justice Sinatra:

Please be advised that HoganWillig, PLLC represents defendant Peter Gerace in the above referenced case, in which we are requesting an Application for Indicative Ruling, pursuant under the Federal Rules of Appellate Procedure §12.1 (b), regarding Hon. Michael J. Roemer's denial for Defendant's request Amendment of the conditions of Mr. Gerace's release pursuant to 18 U.S.C. § 3142 (a)(2). A copy of the Magistrate's Order is enclosed for your review.

Should you review and overrule the Magistrate Judge's decision, we will withdraw our appeal currently at the 2nd Circuit and proceed accordingly.

Thank you for your consideration.

Respectfully submitted,


Harmony A. Healy, Esq.

HAH/cr
Enclosure